

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street, 10th Floor
New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

Tamara Giwa
Executive Director

Jennifer L. Brown
Attorney-in-Charge

June 27, 2025

BY ECF

Hon. Lorna G. Schofield
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

**RE: United States v. Jerrod Lloyd
25 Cr. 285 (LGS)**

Dear Judge Schofield:

The parties write jointly, in response to the Court's order dated June 26, 2025, to propose a scheduling order in the above-captioned matter.

Discovery. Rule 16 discovery in this case will consist primarily of Jerrod Lloyd's criminal history, including records of his prior convictions; the NYPD's ECMS file, including NYPD complaint, DD-5s and attachments, photographs, and property and evidence vouchers; surveillance and NYPD body-worn camera footage; and files from the New York City Office of the Chief Medical Examiner. The government anticipates it will take three weeks to produce discovery, and requests until July 18, 2025 to complete its production of any Rule 16 discovery in its possession, provided a resolution is reached regarding a protective order in this case.¹ The Government acknowledges its discovery obligations are continuing ones.

Motions and Conference Date. The defense respectfully requests until October 15, 2025 to file motions, as the defense is not yet able to evaluate how long it will take to review discovery and discuss the discovery with Mr. Lloyd, who is incarcerated, and counsel will be on trial before Judge Rakoff beginning July 21, 2025. The government requests until October 29, 2025 to respond, with the defense's reply due on November 5, 2025. The parties are available for a status

¹ After conferring, the parties anticipate litigating the contours of a protective order in this case, as we could not reach a resolution on the terms of a proposed order. The Government respectfully requests that this litigation be resolved before it provides its Rule 16 discovery in this case.

conference before 3:30 p.m. on the following days: November 10, November 12 and November 17, 2025.

Speedy Trial Time. The government respectfully requests, with the consent of defense counsel, that the Court exclude time from July 1, 2025, when Mr. Lloyd is scheduled to be arraigned on the indictment, through the next-scheduled conference under the Speedy Trial Act to allow Mr. Lloyd to receive and review discovery, to evaluate whether to file any pretrial motions, and for the parties to discuss a potential pretrial resolution of this case. See 18 U.S.C. § 3161(h)(1)(D), (7)(A).

Thank you for your consideration of this request.

Respectfully submitted,

/s/

Marne L. Lenox, Esq.

Counsel for Jerrod Lloyd

cc: Daniel Roque, Assistant U.S. Attorney

Application Granted in part. Rule 16 discovery shall be completed by **July 18, 2025**. Defendant's motion(s), if any, shall be filed by **September 19, 2025**. The Government's response shall be filed by **October 3, 2025**. Defendant's reply shall be filed by **October 10, 2025**. The parties shall appear for a status conference on **November 4, 2025, at 10:30 a.m.** The Court finds that the ends of justice served by excluding the time between today and November 4, 2025, outweigh the best interests of the public and the Defendant in a speedy trial as provided in 18 U.S.C. § 3161(h)(7)(A) because it will allow the parties time to produce and review discovery, and for the Defendant to evaluate whether to file any pretrial motions and to file any such motions. It is hereby ORDERED that the time between today and November 4, 2025, is excluded. The Clerk of the Court is directed to terminate the letter motion at docket number 9.

Dated: July 1, 2025
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE